

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

PORCHA WOODRUFF,
an individual,
Plaintiff,

Case No. 5:23-cv-11886
Hon. Judith E. Levy

v.

~~CITY OF DETROIT~~
~~a municipal corporation,~~

LaSHAUNTIA OLIVER,
City of Detroit Police Detective,
Individually, and in her Official
Capacities, and
Defendant.

**TRANSCRIPT FOR EXHIBIT 2 OF PLAINTIFF'S REPLY TO RESPONSE
OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

On February 25, 2025, the Court granted Plaintiff's Motion for Leave to File using the Media File Upload (ECF 51). In accordance with the Order Granting Plaintiff's Motion for Leave to File (ECF 54), below is the timestamped transcript for the Media Exhibit of Former Detroit Police Chief James White's Press Conference regarding PLAINTIFF on August 9, 2023.

00:01 girl can spread out a little bit
00:03 okay
00:16 okay good afternoon everyone
00:18 please silence your phones and when
00:20 we're ready for questions please come
00:21 over to the podium state your name and
00:23 your outlet
00:24 and we are asking the interest of time
00:26 to limit to one question
00:29 so everyone can ask one
00:31 joining us today we have Chief Jamesy
00:33 White
00:35 assistant chief David Lavallee office of
00:38 professional development
00:39 assistant chief Charles Fitzgerald
00:42 office of enforcement operations
00:44 assistant chief Eric Ewing office of
00:47 field support
00:48 deputy chief Carrie Sloan detective
00:51 Bureau
00:51 Commander Michael McGinnis of
00:53 Professional Standards internal affairs
00:56 director nazneen Mia office of
00:59 professional development
01:00 executive manager Mary Engelman
01:03 of diversity equity and inclusion we
01:06 also have a few members of our Board of
01:08 police Commissioners we have
01:09 commissioner Reverend Jim Holly Vice
01:12 chair
01:13 commissioner Linda Bernard and
01:15 commissioner Annie Holt
01:18 all right good afternoon everyone and
01:20 thank you for making time to be here I'm
01:22 here to provide a community update
01:24 regarding a lawsuit file last week
01:27 involving facial recognition uh this
01:30 obviously remains a very controversial
01:31 topic but my commitment to transparency
01:35 required to address the the issues that
01:37 have come up in this past week head on
01:39 and that's why we are here today I have
01:42 my staff with me that have assisted in a
01:46 variety of different ways of looking at
01:47 the circumstances involved in the
01:50 lawsuit
01:51 and some of the things that we've
01:53 concluded assistant chief Lavallee will
01:57 be speaking to some of the policy
01:58 revisions that we're going to talk about

01:60 uh and I have uh Commander McGinnis who
02:04 is over our Professional Standards who
02:06 will be launching an internal
02:08 investigation
02:09 there have been
02:12 many reports that the individual
02:14 arrested was because of
02:16 misidentification and facial recognition
02:18 and that is factually incorrect that is
02:20 not the case
02:22 however what is true
02:24 is that the arrests emanated from
02:27 candidly and unfortunately uh a poor
02:31 investigation I'll get into that in a
02:33 moment
02:35 the arrest is was a result of a
02:39 violation of our eyewitness
02:41 identification and lineup policy the
02:44 arrest happened after that violation
02:46 occurred which resulted in a misleading
02:49 lineup and a misleading photo lineup
02:51 again we'll get into that in a moment
02:53 the policy changes that I'm recommending
02:56 to the Border Police Commissioners today
02:58 that hopefully they will be able to take
03:00 up very soon we'll ensure that something
03:03 like this will never happen again
03:05 I'll set some context for you and
03:07 explain what exactly occurred on January
03:11 29 2023 an individual picked up an
03:14 unknown female in the area of East Seven
03:17 Mile and Hoover he then drove to the
03:19 area of Gratiot and bessmore after
03:22 arriving at grass investmore the unknown
03:24 female exited the vehicle and got into a
03:26 black Tahoe a male subsequently exited
03:29 that Tahoe and produced a handgun and
03:31 carjacked the individual now this
03:34 suspect the female had spent some time
03:37 with the driver of that vehicle and that
03:41 victim who was carjacked at this point
03:44 uh the suspect who exited the Tahoe
03:48 carjacked the vehicle taken the vehicle
03:50 uh in the victim's car phone or cell
03:53 phone the phone was later tracked down
03:55 to a BP gas station located at 6420 Van
03:58 Dyke an investigator from dpd responded
04:01 to that location reviewed the gas
04:03 station's video and observed the
04:05 individual who had left the phone so to

04:08 further explain that after the victim
04:12 was carjacked
04:13 uh his vehicle was taken as well as his
04:15 phone uh he contacted a family member
04:18 who then proceeded to continuously call
04:21 his phone to see if they could get
04:24 someone to answer and in fact they did
04:25 do that and when they answered it it was
04:27 determined uh that that was an employee
04:30 at that BP gas station he informed that
04:33 employee that his brother had been
04:34 carjacked and at which time and I just
04:37 identified who he was at which time uh
04:40 the brother said you know my brother was
04:43 a victim of carjacking and the officer
04:46 arrived there pulls the photo looks at
04:49 the video and proceeds to do the
04:51 investigation
04:54 an image of the individual identified
04:57 who dropped the phone or who left the
04:60 phone there they used that photo for
05:03 facial recognition
05:05 the photo lineup from the facial
05:07 recognition
05:09 was created
05:11 the car jacking victim identified the
05:14 image of the person as Miss Woodruff as
05:18 a perpetrator and again just to give you
05:20 a little more background uh the image of
05:23 this female which dropped the foam was
05:26 submitted in accordance with our policy
05:29 with facial recognition because it was
05:30 one of those violent felonies
05:32 the technology yielded an investigative
05:35 lead
05:36 which is exactly what it's supposed to
05:37 do in fact in this instance It produced
05:40 73 possibilities of who the suspect was
05:44 now the human interaction from that
05:46 requires that lead is exhausted you then
05:50 go into the investigation you do a
05:52 number of things to ensure that the
05:54 investigative lead
05:56 is possibly your suspect it's the launch
05:59 of the investigative point it does not
06:02 appear that that occurred
06:04 the lead was turned over to the
06:06 investigator which should have launched
06:08 that investigation that image was peer
06:12 review which is required by policy again

06:14 supporting the fact that the facial
06:16 recognition policy was follow
06:18 however and unfortunately at that point
06:21 a photo lineup was presented to the
06:24 victim and I know this is complex but I
06:26 want to make sure that I hit every key
06:28 point a photo lineup was presented to
06:32 the victim of the carjacking which
06:35 included Miss Woodruff
06:37 the problem with that is you cannot use
06:40 a photo lineup inclusive of a facial
06:43 recognition photo in a lineup cannot
06:47 happen
06:48 the reason for that is facial
06:50 recognition is picking up measurements
06:53 on a face identifying who this could be
06:55 and if you put that into a photo lineup
06:58 essentially what you're doing is
07:00 identifying the most likely person who
07:04 looks like the victim
07:06 that cannot happen our policy prohibits
07:08 that from happening
07:11 the victim's Act of identifying Miss
07:13 Woodruff as the perpetrator served as
07:15 the basis for the warrant submission the
07:17 warrant was subsequently signed to miss
07:19 Woodruff was arrested
07:21 it was later learned that Mrs Woodruff
07:23 was not the perpetrator now the one
07:25 thing that we we did do correctly in
07:27 this matter is we acted quickly the
07:30 investigator then goes to the DDC
07:32 recognizes that our our perpetrator uh
07:36 is eight months pregnant uh asked for
07:39 her immediate release because the
07:41 suspect in this instance was not
07:44 pregnant and so that should have been
07:46 picked up as well
07:47 I have no reason to conclude at this
07:50 time that there has been any violations
07:51 of the dpd facial recognition policy
07:54 however I have determined that there's
07:55 been a number of policy violations by
07:57 the lead investigator in this case dpd
07:60 policies clearly state that members are
08:02 to avoid the use of photos that so
08:05 closely resemble the suspect that a
08:07 person familiar with the suspect might
08:09 find it difficult to distinguish the
08:11 suspect from other individuals presented

08:13 in the lineup and the reason for that is
08:16 when you if you use a facial recognition
08:19 photo if you were to put my photo in
08:21 photo recognition it's not just going to
08:23 produce my photo it's going to produce a
08:26 number of people who could possibly be
08:29 me and if you were to then take that
08:32 photo and put it into a lineup as I
08:35 indicated earlier than it is possible to
08:38 taint the photo lineup by presenting a
08:41 person who looks most like the suspect
08:45 it's a counter-intuitive process you
08:47 wouldn't do that it doesn't make sense
08:49 and it's improper and it's not going to
08:51 happen again
08:53 in other words you don't want to put the
08:54 suspect's twin in a lineup right because
08:57 you would if you don't know the person
08:58 you're going to pick them out what gave
09:00 some validation to the false
09:03 identification of Miss Woodruff was the
09:07 fact that the suspect or the I'm sorry
09:09 the victim had spent some time uh with
09:13 the suspect so it wasn't like it was a
09:15 robbery where the person walked up
09:16 robbed them they glanced at him and left
09:18 they were actually in that vehicle a
09:20 considerable amount of time spending
09:21 some time together before the carjacking
09:23 happened so
09:25 you know one bad Act of not doing a
09:27 thorough investigation second bad Act
09:31 of showing a photo uh and that was
09:34 similar to the suspect LED uh the the
09:38 the victim in this case to say yep
09:39 that's the person and then of course the
09:41 prosecutor signs the warrant and we make
09:44 the arrest normally any identification
09:46 from a photo lineup is not deemed
09:49 conclusive by investigators or
09:51 prosecutors but the victim or witness
09:54 normally only gets a brief look as I
09:56 indicated of the perpetrator during the
09:59 crime photo ID and should only be
10:01 treated as a lead from their
10:03 investigators follow up to see if there
10:05 is other evidence incriminating the
10:06 individual who was identified we have
10:08 talked about that at nauseum that is our
10:10 policy it must be followed each and

10:14 every time
10:15 uh in this case it was not this would be
10:18 no different if we took a mug book a
10:20 paper mug book like the old days and
10:22 took a picture out and went out and said
10:25 is this the person and you said yes and
10:26 we rested them that would be improper
10:28 the same is true here that is the
10:31 beginning of the investigation and in
10:33 2023 there's enough technology Beyond
10:36 facial recognition to to determine if a
10:39 person was near the crime scene such as
10:41 phone dumps I can determine which phone
10:44 towers everyone's got a phone in her
10:46 pocket were you near there were you at
10:48 work I can check and pull phone or work
10:51 records to see if you are in fact at
10:53 work none of those things occurred they
10:56 have to occur in this instance
10:58 from their investigators follow up as
11:00 they indicated to see if any other
11:02 incriminating or individuals were
11:05 identified incriminating evidence or
11:07 other individuals something as simple as
11:10 if it's a robbery and the person was was
11:13 was not if is the person associated with
11:16 the victim those types of things the
11:18 case this case was unusual as I
11:20 indicated because the suspect in the
11:21 victim had spent some time together when
11:23 the victim conclusively identified the
11:26 suspect from the photo lineup that was
11:28 given great weight by the investigators
11:30 and the prosecutors because of the
11:32 extensive time that the suspect and the
11:34 victim had spent together in this case
11:36 one of the photos in the photo lineup
11:38 had been generated by the facial
11:40 recognition system in retrospect it
11:42 seems clear that while the victim's ID
11:44 seemed conclusive the victim had
11:46 identified what equated to a look-alike
11:48 and I have looked at those photos myself
11:51 and very clearly they look alike they
11:55 look alike and that's why the the work
11:57 starts it doesn't stop it starts photo
11:60 lineups are IDs that should be treated
12:03 cautiously in the best of circumstances
12:05 and just to put down a little further
12:08 context for you you know 27 years of

12:10 doing this this work
12:12 before facial recognition photo lineups
12:15 it's the same thing it's even when not
12:18 saying it's the same as facial
12:19 recognition what I'm saying it's the
12:20 same requirement on the investigation a
12:23 mug book pulling out a person's photo
12:25 that's a very powerful tool and you must
12:27 treat it cautiously
12:29 so effective immediately I have issued
12:32 an order changing the Department's photo
12:34 ID lineup policy so that this cannot
12:37 happen again I'm instituting three
12:38 reforms immediately immediately and I'm
12:42 looking forward to the blpc's review of
12:45 the policy uh and approval going forward
12:48 first no member will be allowed to use
12:51 facial recognition derived images in a
12:54 photographic lineup
12:56 period
12:58 you cannot put a facial recognition
13:01 photo in a photo lineup because it's
13:04 going to generate at the least a
13:08 look-alike
13:10 second all photo lineups will be
13:13 conducted using a sequential
13:15 double-blind presentation to the victim
13:17 I will try to explain a sequential
13:20 double-blind presentation without
13:23 getting too lost in the weeks and and
13:25 police talk
13:26 essentially as we've seen on TV there is
13:29 a six people who who line up and those
13:32 are called line live lineups where you
13:34 look at six people is that the person
13:35 who harmed you number three number four
13:37 number five is that person whatever
13:39 number it may be
13:41 on a photo lineup
13:43 what the Department's policy will change
13:45 to instead of putting six people at one
13:47 time on a piece of paper and showing it
13:50 to you what we will do is put six photos
13:53 in an envelope we will take the first
13:56 envelope hand it to you you pull the
13:58 photo out and we will say is that him or
14:00 her it'll be yes or no and we will do
14:03 that six times and six individualized
14:07 envelopes the next key important change
14:11 to our policy will be this

14:13 it will be called it's it's called a
14:15 double blind draw meaning that I'm the
14:19 investigator who knows who the suspect
14:21 is I know who the suspect is
14:23 so I will not participate in the lineup
14:27 however an uninvolved detective who does
14:30 not know who the suspect is will take
14:32 those six photos and they will do the
14:35 sequential draw and provide it to uh the
14:38 victim to identify one of the photos if
14:41 in fact that photo is there and that is
14:43 just an added layer of installation so
14:45 that there is no bias there is no
14:48 predetermined information that you don't
14:51 know which one of the six photos are the
14:53 suspect you then come back to the
14:55 original investigator and say
14:57 our victim picked number three the
14:60 photos will be numbered the envelopes
15:02 will be numbered the now the detective
15:04 who is aware of who the victim is and
15:06 who the suspect is opens the envelope
15:08 and sees that three is either the
15:10 suspect or is not the suspect I know
15:13 that that was a bit wordy but I think it
15:15 was necessary to to explain it I'm sure
15:17 questions will come up about that and
15:19 then finally prior to conducting a
15:20 photographic lineup a supervisor is to
15:22 ensure that there is independent basis
15:25 for believing that's a suspect who is
15:27 pictured uh in the photo lineup or in
15:31 the sequential draw uh has the means
15:35 ability and opportunity to commit the
15:37 crime in other words
15:39 you're not you know eight months
15:41 pregnant
15:42 or you're not out of state during the
15:45 time the crime had been committed uh not
15:48 suggesting that someone who's pregnant
15:49 can't commit a crime but in this
15:50 instance there was no identification or
15:53 identifiers that indicated that our our
15:56 suspect was in fact eight months
15:58 pregnant so that's where we are I would
16:01 like to bring assistant chief lavali up
16:03 just to hit some very high level
16:04 highlights at this time and we will take
16:07 any questions AC levalley
16:10 all right thank you uh so assistant

16:13 chief David Lavallee I oversee the
16:14 office of professional development uh
16:17 part of those duties include policy
16:20 development policy updates uh civil
16:23 rights auditing
16:25 um I can tell you
16:26 as a result of what is occurring right
16:29 now we did do a review of all of our
16:31 facial Rec arrests that have occurred in
16:34 the last year and a half
16:36 uh in in all of those cases except for
16:39 uh the case that we're referring to
16:41 today there was independent evidence
16:44 outside of the facial wreck photograph
16:47 that led the officers to believe there
16:49 was enough probable cause for arrest
16:52 um
16:52 but one of the things that we're going
16:54 to put in place is a policy update on
16:57 our facial recognition policy
16:60 to strengthen our review or our audits
17:05 of those arrests and so what that is is
17:08 every time an officer or an investigator
17:11 believes that they have enough
17:13 information to make an arrest where
17:15 there was a facial recognition
17:16 photograph involved or identification
17:20 involved
17:21 before they can make the arrest or
17:23 before they can submit a warrant to the
17:25 prosecutor we're putting in place a
17:28 two-part review
17:29 much like the review that we had in
17:32 place for identifying a photograph
17:34 through facial recognition uh the peer
17:38 review at that point we're putting in a
17:40 supervisory peer review
17:41 for a request to make an arrest or a
17:44 request to submit a warrant to the
17:46 prosecutor so like the chief mentioned
17:48 the investigators go out they develop
17:50 their probable cause independent of the
17:53 photograph and independent of the name
17:55 that they received
17:57 when they're ready to make their arrest
17:58 they have to go to their commanding
17:60 officer so it'll be the captain of
18:01 either the precinct or the investigative
18:03 unit that's responsible for
18:06 conducting the investigation present

18:09 their case that Captain would then sign
18:12 off on the fact that they believe
18:13 there's enough independent probable
18:15 cause
18:16 then it's reviewed a second time by the
18:20 captain that's in charge of our
18:22 investigative Operations Division they
18:25 sign off and so once they have those two
18:27 independent Captain level reviews they
18:30 condense them at a warrant to the
18:31 prosecutors so that's going to be
18:33 a recommendation that we're making to
18:35 the board of police Commissioners which
18:36 will
18:38 strengthen the review before we make an
18:41 arrest before we take anybody into
18:43 custody where there was facial
18:44 recognition involved in the case I think
18:47 that the other policy reviews
18:49 or policy updates the chief already
18:51 pretty much covered with regard to our
18:55 photo identifications and how we conduct
18:57 those uh those lineups or those
18:60 sequential double-blind draw reviews so
19:05 those are going to be two major policy
19:07 updates that we're going to present to
19:09 the board which we believe will
19:11 strengthen the policy and the use of
19:14 facial recognition to ensure that we
19:16 don't take anybody into custody that we
19:18 don't have enough probable cause to
19:20 believe that they committed the crime
19:22 thank you
19:24 and before I take any questions you know
19:26 we we've got Professional Standards here
19:28 we've got our diversity equity and
19:30 inclusion uh Team uh lead uh and
19:34 certainly uh we have our civil rights
19:36 Integrity Bureau director uh uh Nas uh
19:40 in this line we're all looking at this
19:42 and we take this very seriously uh and
19:45 we want to ensure uh you know that
19:47 nothing like this ever happens again
19:48 particularly
19:50 um you know it's it's particularly
19:52 difficult when you you're talking to
19:54 someone who or talking about someone who
19:57 is eight months pregnant so we we
19:58 empathize with that we we recognize
20:02 um you know we have to do better and

20:04 there will be accountability uh on this
20:06 mistake but but the the misinformation
20:08 is is that this was a you know a
20:11 fraudulent facial recognition Discovery
20:14 uh that that is just incorrect what this
20:17 is uh is very very poor uh investigative
20:20 of work that led to a number of
20:24 enterprise appropriate decisions being
20:26 made along the the lines of the
20:28 investigation and that's something that
20:30 this team is committed to not only
20:32 correcting uh having accountability
20:34 having transparency with this community
20:36 and then building policy immediately to
20:40 ensure regardless of the tool being used
20:42 this never happens I don't care if it's
20:45 a the wrong ticket being written we we
20:47 must do better and we will so with that
20:49 I'll take any questions
20:55 hi Chief Mara McDonald from div
20:59 um I'm trying to from what you've said
21:01 this isn't in your view a technology
21:02 problem it's a human error problem with
21:05 you know operator error
21:06 can you explain so the person who is not
21:09 an investigator can understand
21:12 they put that photo or that video that's
21:15 still that photo in the the facial
21:17 recognition you said they got something
21:19 like 73 hits how do they narrow down
21:22 those 73 hits to four or five that look
21:25 promising and then what should this
21:27 investigator had done should he have not
21:30 showed those pictures number one to that
21:32 to that victim and should he have or she
21:35 have somehow weeded out
21:38 I guess I don't understand what what the
21:41 extra steps should have been to ensure
21:44 that you have the right person in the
21:46 right picture
21:47 so we have uh yes
21:49 um and I like the way you added three
21:51 questions to one very good job uh myself
21:53 today I figured I could get it
21:55 um so what happened uh in this instance
21:58 starting with your the first part of
21:60 your question the 73. so whatever you
22:03 use and because we're talking about fish
22:04 let's talk about facial wreck for one
22:06 second in regards to the what it

22:08 produces so any person in this room if
22:12 your photo is ran through facial records
22:14 Detroit police are not the only agency
22:16 that's using facial Rec as we know MSP
22:18 has it it's it's all over the state and
22:20 various agencies it's in private sector
22:23 casinos it's at airports what happens is
22:26 you you put a picture in okay and it
22:30 produces a number of people it doesn't
22:33 say this is James White it says this
22:36 this is 50 to 70 to 80 opportunities to
22:38 be James White based on an algorithm and
22:42 my my face my my measurements my jaw my
22:45 eyes those types of things
22:47 it produces those numbers and it says
22:50 this could be James White one of 20
22:52 pictures one of a hundred pictures
22:53 included in that are people of different
22:56 gender different race so you if James
22:58 White is a black male
22:60 which I am you go in and you say Okay
23:03 remove all of the females out okay so
23:06 now from that let's say we've got a
23:08 hundred possibilities you take is
23:10 there's 50 females you take 50 out now
23:12 there's 50 left and in that you say okay
23:15 now of the 50 that are left
23:19 um 25 of the these people are white okay
23:22 and James whites the blackmail so you
23:24 take those 25 out now you're left with
23:26 25 and of the 25 what the detectives
23:29 have to do is say Okay of these 25
23:32 looking at the you you turn them over to
23:35 an analyst there's a peer review and you
23:38 say I think 10 of these people could
23:41 possibly be James White the analyst then
23:43 on a peer review takes it looks at it
23:45 and says okay I feel that five of them
23:48 could possibly be but if you think it's
23:50 10 okay let's take a look at them and
23:53 then what you do is you investigate to
23:56 see a what the crime is and if those 10
23:60 people had the opportunity to do it
24:03 meaning if the 10 people you have to
24:07 look at every single one
24:08 it happened you have to make sure that
24:12 they're capable right are they in the
24:14 hospital uh are they handicapped could
24:16 they if the person ran away I I mean
24:19 it's so many different layers okay and

24:21 so now you arrive at a certain number
24:22 after you scrub all of that let's say
24:25 that number goes down to five okay now
24:28 you then start to investigate those five
24:32 for opportunity you do everything you
24:35 need to do you see if there's any
24:36 connection between the victim and the
24:38 suspect if it's a violent crime if
24:39 there's an assault if it's a shooting if
24:41 if the victim told you I was arguing
24:43 with someone at a party you see if that
24:45 other of those five who was at the party
24:47 what you don't do and you will not do is
24:51 take that photo
24:52 plug it into a lineup and then say to
24:56 the victim is that him because
24:60 if you don't know me it's measured it's
25:03 going to identify the likely possibility
25:05 that it is and that's the part that's
25:08 improper so what the detective should
25:09 have done is not that A and B
25:12 detective for it investigative work to
25:14 ensure that the suspects that we've
25:16 identified were there so they went from
25:18 zero to sixty that's exactly
25:20 unfortunately the case but again I think
25:22 the characterization that quote facial
25:24 recognition produced the wrong
25:26 identifier is improper what is proper is
25:29 that the investigator did try to
25:31 investigative work thank you for
25:33 explaining to the non-investigator I get
25:35 it now
25:38 hi Kelly Vaughn CBS Detroit I want to
25:40 make sure I understand this was there a
25:42 policy in place where they were not
25:44 allowed to use facial recognition photos
25:46 in photo lineups before or was that just
25:48 discouraged and now it's an actual
25:50 policy or what's the exact policy change
25:52 so the exact policy change speaks to a
25:55 number of things a that is a strict
25:57 prohibition on using a facial
25:59 recognition photo in a photo lineup okay
26:04 um was it expressly articulated in
26:07 policy
26:09 there is a there is room for
26:11 interpretation that we've completely
26:13 eliminated but it should be understood
26:16 in this work that that is literally

26:20 perhaps one of the most counterintuitive
26:22 things you could do because it is it's
26:24 going to already produce look-alikes and
26:27 and the idea of a lineup is is not to do
26:30 look-alikes is to get people who are
26:33 familiar you know if it's a light
26:36 complected person with a beard then you
26:38 would choose light complected with beard
26:40 but you wouldn't scientifically choose
26:43 people for a photo lineup because that
26:45 would that would not be consistent with
26:48 trying to identify the suspect and by
26:50 the way even in doing that which is
26:52 improper to ever use a facial
26:54 recognition photo in a lineup but even
26:56 in doing that work still needed to occur
26:58 that did not occur in this case and if
27:01 you don't mind would you mind explaining
27:02 where these photos are coming from when
27:04 you're like searching in the database
27:05 are they just mug shots or from being on
27:08 a sidewalk where do the photos come from
27:09 uh mug shots primarily
27:12 um driver's license photos
27:16 yep uh state of Michigan driver's
27:18 license photos uh ID cards and uh mug
27:22 shots
27:27 all right thank you everyone
27:30 foreign

Dated: March 13, 2025

/s/Ivan L. Land

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

In accordance with Rule 19(c), I hereby certify that on March 13, 2025, I served a copy of Former Detroit Police Chief James White Press Conference on Defendant through Defendant's Attorney via email.

Dated: March 13, 2025

Respectfully Submitted,

/s/ Ivan L. Land
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